## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

**Richmond Division** 

IN RE:	)	
	)	
JOCELYN MICHELLE CHANDLER	)	Case No. 16–30451–KLP
	)	Chapter 13
Debtor	)	

# SECOND MOTION FOR EXTENSION OF TIME FOR FILING CERTIFICATE OF COMPLETION OF POST-PETITION FINANCIAL MANAGEMENT COURSE AND CERTIFICATION PURSUANT TO 11 U.S.C. § 1328

COMES NOW the Debtor, by counsel, and files this Motion to extend the time for the filing of the Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328; and in support hereof states unto the Court as follows:

- 1. The Debtor filed the Chapter 13 petition herein on February 4, 2016.
- 2. The Debtor has completed the Chapter 13 Plan payments and the Court has issued a Notice to Debtor and Creditors Concerning Issuance of Discharge.
- 3. The Court has previously granted the Debtor and extension until June 22, 2021 to file a Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328.
- 4. The Debtor has informed counsel that she needs additional time to secure the funds in order to pay for and complete the Post-Petition Financial Management Course.

James E. Kane (VSB #30081) KANE & PAPA, P.C. P.O. Box 508 Richmond, VA 23218 (804) 225-9500 (phone) (804) 225-9598 (fax) jkane@kaneandpapa.com Counsel for Debtor Case 16-30451-KLP Doc 58 Filed 06/22/21 Entered 06/22/21 12:57:59 Desc Main Document Page 2 of 7

WHEREFORE, the Debtor respectfully requests that the Court enter an Order extending the time for the filing of the Debtor's Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328, and for such other relief as the Court may deem appropriate.

Respectfully submitted,

JOCELYN MICHELLE CHANDLER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081) KANE & PAPA, P.C. P.O. Box 508 Richmond, VA 23218 (804) 225-9500 (phone) (804) 225-9598 (fax) jkane@kaneandpapa.com Counsel for Debtor

#### **CERTIFICATE OF SERVICE**

I hereby certify that on June 22, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and to all creditors and parties in interest on the attached mailing matrix.

/s/ James E. Kane
James E. Kane

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IN RE:		
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### **NOTICE OF MOTION AND HEARING**

The above Debtor has filed a Second Motion to extend the time for the filing of her Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328.

<u>Your rights may be affected</u>. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court United States Bankruptcy Court 701 East Broad Street Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire Kane & Papa, P.C. 1313 East Cary Street Richmond, Virginia 23219

• Attend a hearing scheduled for July 14, 2021 at 10:00 a.m. at 701 E. Broad Street, Room 5100, Richmond, VA 23219. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

#### • REMOTE HEARING INFORMATION:

Due to the COVID-19 public health emergency, no in-person hearings are being held.

This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the "Zoom Request Form"), which is available on the Court's internet website at <a href="www.vaeb.courts.gov">www.vaeb.courts.gov</a>, on the page titled, "Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information." Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

\*\*\*The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge's attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.

\*\*\* PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted,

JOCELYN MICHELLE CHANDLER

By: /s/ James E. Kane Counsel

James E. Kane (VSB #30081) KANE & PAPA, P.C. P.O. Box 508 Richmond, VA 23218 (804) 225-9500 (phone) (804) 225-9598 (fax) jkane@kaneandpapa.com Counsel for Debtor

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 22, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and to all creditors and parties in interest on the attached mailing matrix.

/s/ James E. Kane James E. Kane Case 16-30451-KLP Label Matrix for local noticing 0422-3 Case 16-30451-KLP Eastern District of Virginia Richmond Wed Aug 5 16:16:27 EDT 2020

Anderson Financial Services LLC Loan Max 3440 Preston Ridge Rd, Ste 500 Alpharetta, GA 30005-3823

Commonwealth of Virginia Department of Taxation P.O. Box 2156 Richmond, VA 23218-2156

(p) INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346

Loan Max 6900 Midlothian Tnpk. Richmond, VA 23225-5635

Tsi/909 Po Box 17205 Wilmington, DE 19850-7205

Virginia Credit Union P.O. Box 90010 Richmond, VA 23225-9010

James E. Kane Kane & Papa, PC 1313 East Cary Street P.O. Box 508 Richmond, VA 23218-0508 Doc 58 Filed 06/22/21 Entered 06/22/21 12:57:59 Desc Main United States Bankruptcy Court Office of the U. S. Trustee 701 East Broad Street 701 East Broad St., Suite 4304 Richmond, VA 23219-1849

Check City 2729-B West Broad Street Richmond, VA 23220-1905

Po Box 60607 Oklahoma City, OK 73146-0607

Credit Collections Inc/AMR

First Virginia 159 E Belt Blvd Richmond, VA 23224-1203

(p) PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067

Va Credit Union Po Box 90010 Richmond, VA 23225-9010

(p) VIRGINIA DEPARTMENT OF TAXATION P O BOX 2156 RICHMOND VA 23218-2156

Jocelyn Michelle Chandler 6124 Ullswater Avenue Richmond, VA 23225-7742

Check City 3920 Hull Street Road Richmond, VA 23224-1714

Richmond, VA 23219-1888

DEPARTMENT OF THE TREASURY - IRS INTERNAL REVENUE SERVICE P.O. bOX 7346 PHILADELPHIA, PA 19101-7346

Linebarger Goggan Blair & Samp 4828 Loop Central Dr Ste 600 Houston, TX 77081-1246

Transworld Sys Inc/38 507 Prudential Rd Horsham, PA 19044-2308

Verizon 500 Technology Dr Suite 500 Weldon Spring, MO 63304-2225

(p) VIRGINIA PHYSICIANS FOR WOMEN 10710 MIDLOTHIAN TURNPIKE SUITE 200 RICHMOND VA 23235-4759

Suzanne E. Wade 341 Dial 877-996-8484 Code 2385911 7202 Glen Forest Drive, Ste. 202 Richmond, VA 23226-3770

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Department of the Treasury Financial Management Service P.O. Box 1686 Birmingham, AL 35201-0000

(d) Internal Revenue Service Kansas City, MO 64999-0002

Portfolio Recovery Attn: Bankruptcy Po Box 41067 Norfolk, VA 23541-0000 Richmond, VA 23218-1115

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Virginia Credit Union, Inc. PO Box 90010 Richmond, VA 23225-9010

End of Label Matrix Mailable recipients 23 Bypassed recipients 1 Total 24